

COMMONWEALTH OF MASSACHUSETTS

SUPREME JUDICIAL COURT

SUFFOLK, ss Appeals Court Nos.¹ 2021-P-0503
2021-P-0901
2021-P-0902

Imre Kifor, Appellant

V.

Barbara A. Duchesne & Cynthia S. Oulton, Appellees

On Appeal From Middlesex Superior Court

DOCKET No. 2081CV00109

On Appeal From Single Justice Appeals Court

Prior DOCKET No. 2021-P-0825

On Appeal From Middlesex Probate And Family Court

DOCKET Nos. MI07D3172DV1, MI11W0787WD/MI11W1147WD

Imre Kifor's Application for Direct Appellate Review

10/5/2021 and 10/13/2021

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¹ Please see the attached "Affidavit On The Necessity For Filing Simultaneous And Identical Applications For DAR."

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REQUEST FOR DIRECT APPELLATE REVIEW

Appellant Imre Kifor, ("Father"), respectfully asks this Court to grant direct appellate review of these four consolidated cases, as together they present a significant question of first impression: they are about deliberately "virtualizing" lawsuits, directly or indirectly, and splitting judgments into a) few strict non-appealable pages, and b) "anything goes" defamatory and child-predatory false disinformation blobs, all deliberately fabricated in "QAnon-style."

Virtual lawsuits, just like virtual realities, merely simulate and even blatantly provoke convenient and deeply abusive "high conflicts," that can then be litigated ad nauseam for obscene astronomical profits.

Father has consistently pointed to the legacy of Atty. Monroe Inker³, "the father of modern family law," of having intentionally and forcefully injected into our laws a plagiarized "Marxist" **Critical [Feminist] Theory** by hijacking needed, but limited, to satisfy consistency, "conclusive presumptions" measures.

³ <https://www.mcle.org/give/fund/bio/inker> and <https://femfas.net/inker.pdf>

The thus "progressive" recipe is simple, provoke "evil" fathers to resist any inherently child-abusive treatment, and the thus reinterpreted "attacks" on the protected "victim" mothers becomes justified cause for swift punishments in any hence colluding Family Court.

All tyrannies of conveniently silenced "white" histories (e.g. fascism, socialism, communism), have been built on some easily morphed variant of "Critical Theory." Proven by all tyrannies eventually collapsing due to simply "running out of money," Father's forced full indigency is just as intractable and unchanging.

Without a proper and effective review of the root causes of these forced controversies, thus predictable "Einstein Insanity"⁴ by all of our courts will continue to be on display, while also manifestly wasting public resources and deliberately torturing our children.

STATEMENT OF PRIOR PROCEEDINGS

Starting in 2011, Middlesex Probate and Family Court, ("Family Court"), knowingly allowed bitterly jealous "Mothers" to virtualize dissonant parallel realities.

⁴ "Insanity is doing the same thing over and over and expecting different results" - perhaps Albert Einstein.

Notoriously cruel Harvard psychologist GALs were allowed to fabricate false but irrefutable narratives: "specifically, [child] is afraid the father will 'put suction cups on her feet and take her out the window,' and [child] is afraid the father would 'put him in boiling water' if he went back in the father's care."

The two parallel judgments were split into a few rational "strict" or appeal-proof pages, and then were loaded up with starkly inconsistent disinformation, as lucrative "storybooks" for later endless litigations.

After original lawsuits ended, and outside of any judicial context, a single well documented deliberate contractual fraud and ultimate defamation occurred, as a clear starting point of the later vast chain-fraud.

Its still ongoing defaming and therefore damaging effects have been thoroughly documented in the lower courts and have completely depleted Father's finances.

Father has been truthful, voluntarily offering his extensive full evidence regarding his indigency and existential crisis. Family Court then initiated a punitive crusade against him by blocking, ignoring,

deflecting, delaying, denying, etc. his any attempts at the impossible: to prove innocence and indigency.

As Father was alleging meticulously documented child-predatory "mental health" fraud and ruthless activism in court, he was labelled "dangerous," and was punitively silenced and then sentenced to jail.

The lower Superior Court's conclusion that he had been somehow adjudicated in the Family Court simply cannot hold, as Father had been forcefully silenced.

Father's actively pursued civil rights violation lawsuit against the Family Court is now defined by its ample documented evidence that, while he "had his day in court," as per the lower courts' many judgments, in fact the Family Court went to extreme lengths of not allowing Father to file anything, nor to submit any of his evidence, nor to call any of his witnesses.

One can plausibly attribute the motives behind the Family Court falsifying the docket records to yet more overt silencing attempts from any appeals review.

Father reasserts that subsequent Appeals Court decisions based on presumptions of "truthful" docket

records constitutes further material proof of Family Court's deliberate deceiving and defrauding of the Appeals Court, while also clearly sabotaging Father's right to appeal, pursuant to M.G.L.c. 215, § 9.

STATEMENT OF FACTS RELEVANT TO APPEALS⁵

1. Prior court proceedings reinforced Mothers' views that they would always stereotypically win in court.
2. Mothers simultaneously provoked and then staged a child-abuse "incident" to start their race for money.
3. They created a **doctored** audio recording and kept it for more than a year in order to force their agenda.
4. A 400 times MA GAL Harvard "feminist" psychologist deliberately embellished the record in QAnon fashion, knowing that Family Court would immediately bury even Father's 110 pages affidavit, documenting 973 errors.
5. The tortured children have been brutally shipped to New Hampshire, with Family Court's full knowledge, to be forcefully medicated under false pretenses, and to be brainwashed for years against their loving father.

⁵ See addendum for proofs of similarly numbered evidences. Full contents of all referenced documents have been e-filed in the lower courts or are part of the record appendices.

6. As stereotypical projection of mental health "ills" is a basis for **child-predatory schemes**, Family Court refused to consider any efforts to prove the opposite.

7. And the more Father resisted Family Court's cruelly forced agenda, the more they had to invent infantile fabrications, like ignoring his children's birthdays.

8. Openly torturing crying children is the "feminist" mechanism to provoke male "attacks" for the court's purposes, and hence Father voluntarily terminating the endless waterboarding "supervisions" of his children, to proactively protect them, became the needed proof.

9. Predictably, the activist Family Court, obsessed with hiding the routine child-predatory "feminist" GAL investigations, blindly ignored the "why". Instead, it retorted to **suborn perjury on the children** themselves.

10. As protective reasons for cancelling supervised visitations crystalized with the defamation lawsuit, Family Court amplified **silencing the whistleblower**.

11. The "dangerous" Father's clearly conveyed list of witnesses for trial purposes were repeatedly denied.

12. Even the most critical evidence, the visitations cancelling email, was denied from Father's trial; in addition to the rejected 15,000+ pages of meticulous documentation finally e-filed with the Appeals Court.

13. As a result of malicious and ruthlessly vicious stereotypical "all-out war," Father has been falsely imprisoned, forcefully and fully separated from his dear children, professionally defamed, and utterly destroyed, with his existence and livelihood denied.

14. The root cause of these intractable issues lies in the deliberate and materially significant discrepancy of the 2/13/2014 and 6/30/2014 parallel judgments. The "cancer" of protecting inconsistent activism in court has now spread to Superior and Appeals Courts as well.

STATEMENT OF ISSUES OF LAW RAISED BY APPEALS

This appeal raises the following questions, all of which were raised and preserved before the courts:

1. Did Family Court err on 10/21/2019, A:132⁶, when ordering a now confirmed indigent Father to jail for

⁶ References to exhibits are as follows: 'A:p' where 'p' page in the attached Addendum.

not being able to pay \$15,000+ to the millionaire Mother, nor even a mere \$1,464 to purge his sentence?

2. Starting with the 2/12/2018 Family Court hearing, A:893, Father has been vocal about his intractable circumstances due to documented fraud allowed in court. Did Family Court err on 8/8/2019, A:129, when secretly sentencing him for not being able to pay?

3. A capable software engineer, with advanced degrees and a proven track record, Father repeatedly pled in Family Court that inconsistent and misrepresenting court orders render his conditions for mere existence impossible. Did Family Court err on 4/24/2019, A:120, when ordering Father to abandon his profession and to seek "any" employment, while denying all his filings?

4. Father was informed that Family Court controls the suspension of licenses. His licenses were suspended on 6/13/2019, A:122. Did Family Court err on 6/6/2019, A:832, for ordering Father to get a "minimum wage" job while knowing that his licenses would be suspended?

5. Did Family Court err on 6/13/2019, A:124, when ordering an indigent and thus degraded Father to apply for "5 jobs a week" without even a driver's license?

6. Did Family Court err on 8/22/2019, A:982, when denying Father to cross-reference contradicting court orders, while trying to specifically point out numeric impossibilities in therefore forced child supports?

7. Family Court suddenly denied to continue to award legal fees for Mothers on 6/23/2021, A:153. Did Family Court err on 6/13/2019 and 12/6/2019, A:125,134, when awarding legal fees to the attorneys despite their documented, and now proven, long-term abusive fraud?

8. Father has been alleging deliberate and documented fraud in court by attorneys, A:818. Accordingly, he has repeatedly filed motions in both Family Court and Superior Court to investigate the attorneys' conduct and to sanction them. As per outside agencies, e.g. AGO and BBO, the courts bear such responsibility. Did the courts err when denying or systemically neglecting and/or opposing to investigate any "trusted" officers?

9. Father has been also alleging documented systemic fraud on the Court, and that the courts were seemingly covering it up, while deliberately abusing children, A:774. Accordingly, the in-arrears combined child supports/expenses/health-insurances that Father owes

to his children have now reached **\$230,000+**. Did Family Court err on 6/4/2021, A:152, when ordering another at least 6 months delay without considering any relief?

10. In his civil rights violations complaint, A:427, Father alleged that Family Court had been denying his due process rights. After being served, Family Court seems to have started to respond to Father's "banned" pleadings. Did Family Court err on 6/13/2019, A:125, by severely restricting and/or denying Father's rights to file motions, and thus effectively silencing him?

11. Father's complaint for civil rights violations against Family Court is still without a response. Did Family Court err on 6/23/2021, A:153, for dismissing Father's both new complaints for modifications on the basis of "no material change" in the circumstances?

12. After the 6/13/2019 suspension of his licenses, Father received a confused "not yet" notification on 3/4/2020 just as the pandemic started. Father's weekly statements from MA DOR have stopped altogether after 1/28/2021. The now confirmed indigent Father still has no licenses and he cannot escape his deliberately forced house arrest, A:143. Did Family Court err on

6/23/2021, A:153,154 when dismissing his both new complaints for "no material change" in circumstances?

13. Father filed his above 2 new complaints in Family Court on 10/19/2020 after a documented defamation/fraud renewal in the matters, A:826. The renewal occurred just 4 days before, during the 10/14/2020 hearing in Superior Court. Did Superior Court err on 10/15/2020, A:145, when dismissing Father's complaint for defamation as a result of such a renewal of the deliberate fraud, freely allowed to re-occur in court?

14. Mothers committed the original defamation/fraud in 2014 and could not be adjudicated in Superior Court in 2020. Did Superior Court err on 4/8/2021, A:146, when concluding otherwise to obstruct from fraud renewal?

15. The Appeals Court affirmed Father's desperate attempts to appeal the decisions by Family Court on 3/2/2021. It also confirmed on 3/9/2021 that, in fact, no appeals had been even possible due to Family Court neglecting to act on Father's timely and repeated Notices of Appeals. Did Superior Court err on 10/15/2020, when basing the decision to dismiss, inter

alia, on "pending appeals," that had been, in fact, effectively banned and sabotaged by Family Court?

16. On 1/6/2020, A:136, Family Court acknowledged Father's intentions to question the prior rulings and judgments, A:138. During the 2/19/2020 hearing, A:820, Family Court accepted his steps to appeal subsequent denials. Despite Father's timely pleadings re: the Family Court's secretive effective ban of appeals, the 6/4/2021 order, A:152, still maintained, "Father has not caused any appeal to be filed with" this Appeals Court. Did Family Court err on 6/23/2021, A:154, when dismissing Father's complaint, apparently to obstruct from reviewing any such secretive ban of appeals.

17. Family Court's acts to obstruct from reviewing any of its incoherent rulings and judgment are systemic, A:119. Did Family Court err on 1/25/2020, A:141, when denying any consideration of fraud committed in court?

18. Father's core allegations of fraud in Family Court have all been connected to leveraging children. Did Family Court err on 4/24/2019, A:719, by infesting the record with more abusive fabrications on children?

19. Systemic fraud always leads to intractable and thus fragile inconsistencies. Did Family Court err on 9/26/2018, A:963, when deliberately reframing a prior judgment without considering opposing filed evidence?

20. The root cause of these intractable issues lies in the deliberate and materially significant discrepancy of the 2/13/2014 and 6/30/2014, A:172,199, parallel judgments. Did Family Court err when allowing the judgments' "storybooks" to contain over 1,200+ textual inconsistencies, A:456, knowingly feeding a scheme for subsequent "high-conflict" child-abusive chaos and judicial "cancer" as a systemic fraud on all courts?

21. Did Family Court err on 4/24/2019, A:788, by severely restricting and denying Father's rights to plead, and thus effectively silencing a whistleblower?

22. Did Family Court err on 4/24/2019, A:732, when banning Father from contacting his children in any way, as he has unsuccessfully attempted to call his dear children on the internet for a now **1,228 times**?

23. Did Family Court err when deceiving the Appeals Court on 8/23/2021, A:155, regarding the 6/23/2021 dismissal of Father's complaint, a final decision?

BRIEF (LIMITED TO 10 PAGES) STATEMENT OF ARGUMENT

The Public Statement, "An appellate court will not overturn any factual findings by a judge unless there was no evidence before the court that supported the finding or if the evidence against that finding was so overwhelming that no rational person could make that finding," is the logical foundation of this argument.

The core controversy of these cases stems from an arbitrary application of a stereotypical "conclusive presumption" doctrine in court. Rooted in the Marxist "Critical Theory," any unconditional protection of any group of people by such ad-hoc "laws" will result in inconsistencies, plain absurdities and legal chaos.

Communist tyrannies have solved such legal chaos created by their "guilty until proven innocent" dictum with forcefully silenced free labor, e.g. Gulag camps.

As the negative cannot be directly proven, e.g. one cannot prove innocence, predatory "conclusive presumptions" work by attrition, through deliberately provoked existential efforts to prove the impossible. Common-sense logic and the reductio ad absurdum, i.e. "a method of proving the falsity of a premise by

showing that its logical consequence is absurd or contradictory," provides the safety for a "rational person" from the predatory tyranny of the "victims."

As a Pro Se layman, Father has no training nor skills in legal matters. From the Public Statement he simply concludes that: a) a false judgment of a thing followed by a true judgment of the same thing, without any change in the circumstances, is absurd and must be an error, and b) correctly applied faultless laws leading to absurd judgments must mean faulty premises.

RE#1: It is trivial to prove that one has something, but it is impossible to directly prove that one has nothing. Despite Father's voluntary full disclosure since 2/12/2018, Family Court has deliberately dragged out the thus fabricated "uncertainty" about Father's unchangeable, under current circumstances, indigency. As two directly opposing judgments about indigency cannot hold, Family Court must have erred ordering Father to jail, J.A. Sullivan Corp. v. Commonwealth.

RE#2: To forcefully double down on the deliberately fabricated "uncertainty" about Father, Family Court explicitly denied considering any of his voluntary and

full disclosures and evidences. As a blatant abuse of discretion, Pelican Production Corp. v. Marino, the court then ordered and kept Father in jail with the intent to intimidate him and silence his complaints.

RE#3: A software engineer, Father had been technically able to publish on his own accord. Denying it, A:785, and forcing him to abandon his profession, to seek the ordered "minimum wage" jobs, effectively circumvented his freedom of speech, per the U.S. Const. Amend. I.

RE#4: Family Court lecturing Father, "I've given you chance after chance," A:927, while issuing impossible orders, i.e. to seek a minimum wage job without even as much as a driver's license, is abuse of discretion per "manifestly unreasonable judgment, prejudice, bias or ill will," Pelican Production Corp. v. Marino.

RE#5: While Father immediately complied with orders and emailed his offering of services to 800+ contacts, A:927, his efforts were left unanswered. As Family Court's true objective had been to forcefully silence Father, the impossible court orders were only a "means to an end," and thus "definite, clear or unmistakable errors," Cummings v. General Motors Corporation.

RE#6: Family Court denying all evidence, specifically the parallel court orders directly contradicting each other, and the fact that forcefully lowered income by Family Court must result in changed child support amounts, A:982, is "inconsistent with the relevant legal standard," Johnson v. Modern Continental Constr.

RE#7: Juxtaposition of rulings by Family Court lead to absurdity: legal fees awarded and then retracted with no changes whatsoever in Father's circumstances. As tort of fraud or deceit by attorneys is "determined by the same rules that apply to any defendant regardless of whether he is a professional," Brown v. Gerstein, Family Court must have erred when awarding legal fees.

RE#8: The "appellate courts hold broad power to review whether proper legal standards were applied," Trillium, Inc. v. Cheung, when Family Court repeatedly denied and/or systemically neglected or even opposed to investigate the "trusted" officers of the court.

RE#9: When "substantial risk of a miscarriage of justice exists," deliberately delaying considerations by the court would aggravate the condition "whether

the result of the trial might have been different had the error not been made," Commonwealth v. Randolph.

RE#10: Father has alleged repeated violations of his US and MA Const. rights, specifically Amends. 1, 5 and 14, and Mass. Declaration of the Rights, pursuant to 42 U.S.C. § 1983 and M.G.L.c. 12 § 11 in his complaint against Family Court, A:486. As all such silencing attempts create substantial risks of a miscarriage of justice with real consequences, Commonwealth v. Alphas, sudden reversals like this point to errors.

RE#11: Father's complaint for civil rights violations and desperate existential efforts to fully appeal all judgments have resulted in Family Court's significant reversals. While Father's personal circumstances have not changed, the Family Court's prior acts have been reframed. Therefore, any claim of "no material change" in circumstances is deliberately misleading and points to errors, First National Bank of Boston v. Brink.

RE#12: Confusing "flip-flopping" by DOR re: Father's suspended licenses has caused significant hardship for him, once again not by his fault. While "common sense and the probable intent," Fay, Spofford & Thorndike,

Inc. v. Massachusetts Port Authority, drives a court's interpretations of the DOR letters, a claim of "no material change" in context must still be in error.

RE#13: Having had denied Father's due process rights, A:486, Family Court could not have had adjudicated "The [defamation/fraud] Event" without errors. As "the 'clearly erroneous' standard of appellate review does not protect findings of fact or conclusions based on incorrect legal standards," Kendall v. Selvaggio, the Superior Court's dismissal must also be in error.

RE#14: Superior Court could not have had adjudicated the never once expressly referred to "The [defamation/fraud] Event" either. As "[w]e conduct an independent review of the judge's application of constitutional principles to the facts found," Commonwealth v. Hoose, this Court must find Superior Court in error again.

RE#15: Any Superior Court decision on claimed "pending appeals," that had been deliberately banned by Family Court, A:257, and thus never even possible, is a thus clear evidence that "the conduct is part of a pattern or scheme to defraud," Rockdale Management Co. v. Shawmut Bank, N.A., and must have been an error.

RE#16: While Father had taken all steps necessary to comply with the requirements of Rule 60(b), Park Corp. v. Lexington Ins. Co., Family Court falsely accusing him with "failing to file his appeals" and dismissing his subsequent complaints must be in error as it obstructs from reviewing the secretive ban on appeals.

RE#17: While Father's desperate efforts to overcome systemic fraud were reasonably hindered by the Rule 60(b) "higher hurdles," Cummings v. General Motors Corporation, Family Court's effective ban on appeals constituted unreasonable and unjust total obstacles.

RE#18: Father has been consistently pointing to the systemic fraud allowed to fester in Family Court as the root cause of the clear impasse. Despite the "narrow" and limited review afforded to Rule 60(b), Amoco Oil Co. v. U.S.E.P.A., Family Court still maliciously attempted to destroy Father's case by deliberately infesting the record with fabrications, including **subornation of perjury on his children.**

RE#19: Family Court's deliberate reframing of a prior judgment while denying any and all evidence from

Father was an attempt to "defile the court itself," Winthrop Corp. v. Lowenthal, and must be an error.

RE#20: Even the Family Court judge noted with dismay, "rotten from the head". As this purpose-fabricated, cruel, child-abusive "high-conflict" legal chaos, and outright judicial "cancer" of fraud and systemic deception metastasized now throughout our courts, and fits the definition of "fraud on the court," Rockdale Management Co. v. Shawmut Bank, N.A., the original two judgments of 2/13/2014 and 6/30/2014 must be in error.

"The Event" occurred in late 2014. The resulting "supervised waterboarding" of dear children continued weekly for 2 years. The "mental health" defamation and fraud still continues in Family Court with Father's filings deemed "unintelligible," "incomprehensible," as Family Court's 6/13/2019 judgment stated "Father... was unable to cogently provide adequate grounds." But with his also 15,000+ pages of deliberately silenced evidence, "the most egregious conduct involving a corruption of the judicial process itself," Dawson v. Equity Investment Group, No., is thus established.

The attorneys' "absolutely privileged, even in bad faith" blatant excuses for their "high-conflict," deeply child-abusive fabrications, openly encouraged to fester in Family Court, also fits the, "the most egregious misconduct... **the fabrication of evidence by a party in which an attorney is implicated'** (emphasis added)," Cashman Equip. Corp. v. Penny, standard.

On 2/12/2018 Mother-C stated under oath in Family Court, "Also, I had concerns about his mental health. And I remember Dr. Deutsch did psychological testing," A:660. Family Court later unconditionally accepted her maliciously false insinuations, as evidenced by the 4/11/2019 judgment, A:112, to dismiss, while even she started complaining, "This harms the children. This needs to stop," on 6/25/2020. As Family Court refuses to consider any evidence, even as the in-arrears combined "stolen" child supports have now reached **\$230,000+**, "when it offends justice to deny such relief" Yapp v. Excel Corp., must be then applicable.

Family Court's 4/11/2019 and 6/13/2019 fraud-based judgments and 10/21/2019 sentencing fall outside of the rule 60(b)(3) strict 1 year requirement, Sahin

v. Sahin. As Father's earnest, documented efforts to have the judgments reconsidered, stayed, or appealed have been silently banned, he could not have filed for relief any sooner, Sahin v. Sahin, Parrell v. Keenan.

"The Scheme" started on 5/2 and 10/2011, when Mothers filed their deliberately false statements in Family Court. Their later blatant deceptions and obstruction has continued to this day. Father's denied ability to secure an income, support his children and have any meaningful relationship with them, and to simply continue to exist without being thrown in jail for wanting to equally provide for all of his children will not just disappear. "Rule 60 (b) (6) vests 'power in courts adequate to enable them to vacate judgments whenever such action is appropriate to accomplish justice,'" Parrell v. Keenan, must be then applicable.

One expects similarity in outcomes from a court's clear observations of "parallel custody investigations regarding two sets of children with the same father progressing at the same time without any official acknowledgment." But a textual analysis of the two 2/13/2014 and 6/30/2014 "finding of facts," or loosely

"storybooks", yields 1,200+ discrepancies, A:393.

Family Court's punitive actions to bury Father's analysis of the seemingly routine child-predatory GAL investigations in our family courts is extraordinary, satisfying Zurich North America v. Matrix Serv., Inc.

Family Court silencing complaints of a) forced, out-of-state brainwashing and medicating of children, who had suffered from diagnosed PTSD and repeated uprooting, b) painful, unnecessary (cancer) surgery of a child, paid with fraudulent health insurance funds, c) endless, child-torturing supervised visits with a single "waterboarding" agenda, and d) deliberate child abuse, i.e. "fathers are toxic" type of parental alienation, even by public schools, show "a complete absence of reasonable basis," Yapp v. Excel Corp.

WHY DIRECT APPELLATE REVIEW IS APPROPRIATE

Direct appellate review is appropriate where an appeal presents (1) questions of first impression or novel questions of law, (2) state or federal constitutional questions, or (3) questions of substantial public interest, Mass. R. App. P. 11(a). These consolidated appeals present all three above types of questions.

As per highly-lucrative but fuzzy "mental health" or "toxic masculinity" win-win legal "schemes," the appeal-proof judgments feature implicit "no comments." But the "storybooks" go on-and-on about stereotypical and disgusting QAnon-style narratives, and endless "possible" horrors without any required fair balance. Contrary to "Court must remain neutral and impartial" claim, such allowed disinformation is anything but.

While backing up strict judicial conclusions with explicit "findings of fact" is logical, there are no **anti-sabotage safeguards** in place to protect from the "storybooks" becoming the thus appeal-proof judgments.

Apparently counting on Father's "amateurish" Pro Se matters "falling through the cracks" of the very complex appeals processes, the cynical Family Court punitively left parallel contempt actions intact with two December and January hearings already scheduled.

Without any changes in circumstances, Father will have no choice but to identically resubmit his so far successfully ignored motions to the parallel hearings. To be consistent, Family Court must then once again a) blatantly silence Father's "free speech," b) violate

his "due process" rights, and c) forcefully override his "equal protection" rights, rendering both **US and MA Constitutions irrelevant** relative to the forcefully injected "activist" doctrine of "all women tell the truth" vs. "all men are evil, toxic liars, needing to duly prove their innocence every step of the way."

Father's many allegations have been substantiated with the recently silenced proof of allowed, and thus **routine subornation of perjury on children** by Family Court, while the prior, deliberate and heinous child-predatory alleged crimes still falling within the 18 U.S.C. §§ 1961-1968 (RICO) act's 10 year limit.

WHEREFORE, Father respectfully requests that this Court grant him relief from the lower courts' prior orders and judgments by applying Mass. R.Civ.P. 60(b)(3) and 60(b)(6) independently to a) the still recent fraud chain related to "The Event," and to b) "The Scheme" systemic fraud on the court, respectively, to vacate and expunge all orders and judgments, as per B.C. v. F.C., and Commissioner of Probation v. Adams.

Signed under the pains and penalties of perjury.

10/5/2021 and 10/13/2021

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

Pursuant to Mass. R.A.P. 16(k)

I, Imre Kifor, Pro Se, hereby certify that the foregoing brief complies with the rules of the court that pertain to the filing of briefs, including, but not limited to:

Mass. R.A.P. 11 (b) (applications for DAR);

Mass. R.A.P. 16 (a) (13) (addendum);

Mass. R.A.P. 16 (e) (references to the record);

Mass. R.A.P. 18 (appendix to the briefs);

Mass. R.A.P. 20 (form and length of documents);

Mass. R.A.P. 21 (redaction).

I further certify that the foregoing brief complies with the applicable length limitation in Mass. R.A.P. 20 because it is produced in the monospaced font Courier New at size 12, 10 characters per inch, and contains 10 total non-excluded (brief argument) pages.

CERTIFICATE OF SERVICE

Pursuant to Mass. R.A.P. 13(d), I hereby certify,
under the penalties of perjury, that on 10/5/2021 and
10/13/2021, I have made simultaneous service of this
brief upon the attorney of record for each party, or
if the party has no attorney then I made service
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⁷ The children's names and addresses have been redacted in the attached exhibits for their protection.

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